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July 20, 2012

#### **VIA ECFS**

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street Washington, D.C. 20554

Re: Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Dear Ms. Dortch:

On Thursday, July 19, 2012, John Nakahata and Kasey Chow, on behalf of FedLink Wireless, LLC ("FedLink"), as well as Thomas Adair and Jenny Tadlock, President and Executive Assistant to the President, respectively, of FedLink spoke with Kimberly Scardino, Divya Shenoy, Alexander Minard, and Jonathan Lechter of the Telecommunications Access Policy Division. We discussed FedLink's Compliance Plan as originally filed on April 9, 2012.

John Nakahata gave a brief introduction and overview of the Company. Thomas Adair elaborated on the Company, its current operations, its financial and technical capability to provide Lifeline service, and its commitment to provide quality customer care. Jenny Tadlock elaborated on the Company's enrollment procedures.

We discussed FedLink's affiliate Fast Phones, Inc. and Thomas Adair's extensive experience in the telecommunications industry, particularly wireline retail and wireline Lifeline provision. We also discussed FedLink's commitment to abide by all FCC regulations, especially those regarding Lifeline customer eligibility, certifications and annual re-certifications.

Finally, FedLink agreed to file a revised Compliance Plan with all suggested changes and additions. Attached is a copy of the presentation deck that was provided at the meeting yesterday.

Ms. Marlene H. Dortch July 20, 2012 Page 2

Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ KASEY CHOW

Kasey C. Chow Associate to Lance J.M. Steinhart Attorney for FedLink Wireless, LLC

#### Attachments

cc: Thomas Adair

Jenny Tadlock John Nakahata Kimberly Scardino Divya Shenoy Alexander Minard Jonathan Lechter

# FedLink Wireless, LLC

Federal Communications Commission

July 19, 2012



# Agenda

- Introduction to FedLink Wireless, LLC
- Financial Capability
- Technical Capability
- FedLink's Lifeline Plans
- Marketing / Advertising Plan
- Enrolling Lifeline Customers
- Recertifying Lifeline Customers
- Preventing Waste, Fraud & Abuse
- Q & A



### FedLink Wireless, LLC

Names and Identifiers used by FedLink Wireless, LLC:

- FedLink Wireless
- FedLink



### FedLink Wireless, LLC

In compliance with newly amended section 54.202, FedLink certifies:

- It will comply with the service requirements applicable to the support that it receives;
- It has the ability to remain functional in emergency situations;
- It will satisfy applicable consumer protection and service quality standards; and
- It is financially and technically capable of providing the Lifeline service.



### Financial Capability

FedLink is financially capable of providing the supported Lifeline service:

- Financial Resources
- Affiliates
- FedLink plans to simultaneously launch both Lifeline and non-Lifeline wireless services after FCC Compliance Plan approval and receipt of ETC designations



### **Technical Capability**

FedLink is technically capable of providing the supported Lifeline service :

- Key Management Experience
  - Thomas Adair 15+ yrs in telecom business/management
  - Other key management personnel



#### FedLink Lifeline Plans

FedLink proposes a choice between two (2) Lifeline plans:

- 100 Monthly Minutes
- 250 Monthly Minutes

#### All plans include:

- Free handset
- Free calls to 911 Emergency Services
- Free calls to Customer Service
- Free Voicemail, Caller ID, and Call Waiting
- Free Domestic Long Distance



#### FedLink Lifeline Plans

<u>100 Monthly Minutes</u> <u>250 Monthly Minutes</u>

FREE FREE

100 Anytime Minutes 250 Anytime Minutes

Minutes Rollover Minutes DO NOT Rollover

3 texts = 1 minute No Texting



#### FedLink Lifeline Plans

Public Safety and 911 / E911 Access:

- FedLink will ensure that all handsets used in connection with its Lifeline service are E911-compliant.
- FedLink will provide its Lifeline customers with access to 911 and E911 services:
  - through its underlying carrier, Sprint
  - at the time of Lifeline service initiation
  - regardless of activation status and minute availability



## FedLink Marketing / Advertising Plan

All materials will comply with disclosure requirements:

- Disclose company name under which it does business;
- Explain in clear, easily understood language the following:
  - ✓ Only eligible consumer may enroll in the program;
  - ✓ What documentation is necessary for enrollment;
  - ✓ The program is limited to one benefit per household, consisting of either wireline or wireless service;
  - ✓ Lifeline is a government benefit program; and
  - ✓ Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.



## FedLink Marketing / Advertising Plan

FedLink intends to market its Lifeline service via:

- Community Events
- TV / Radio spots
- Direct mail
- Flyers / Brochures





### **Enrolling Lifeline Customers**

#### Eligibility Confirmation:

- 1. Confirm prospect's identity (see government issued picture ID)
- 2. Confirm program or income eligibility (see proof)
- 3. Confirm valid household address and whether permanent/temporary or multi-household (validate w/USPS)
- 4. Confirm prospect not currently receiving subsidy (ask prospect, perform duplicate check into an internal and pooled external database)
- 5. Confirm that eligible party has received the handset and has used it prior to seeking reimbursement



## Enrolling Lifeline Customers

#### End-User Education and Disclosures:

- Lifeline is a federal non-transferable benefit
- Lifeline service is available for only one line per household
- A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
- Households are NOT permitted to receive benefits from multiple providers
- Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government



## **Enrolling Lifeline Customers**

#### **End User Attestations:**

See Certification Form

	I am not listed	as a depe	elving a Lifeline benefit. I ndent on another pers w is my primary reside	on's tax return	(unless over the ag nd home or busines any within 30 days	s	
Wireless Lifeline Servi	ce Application and Ce	rtificati	on	LA	Lifeline benefits is lity for Lifeline at ar ermination of my Li to the best of my ki	ny time, and my failure to re-certify as to feline benefits	
A complete and signed Lifeline Service Application and Company") Lifeline service program in your state. This Cerand will not be used for any other purpose. Service requirements	tification is only for the purpo	ose of verif	ying your eligibility for L	feline service	es, and I will comp	cluding adults who do not contribute olete a separate additional form. ust personally activate it by calling customer	
One Ufeline service per household disclosures: Lifeline is a Lifeline benefit can result in fines, imprisomment, de-emot line of service per household. A blueshold is defined, for together at the same address and share income and expenses tileline disclosure to either one landline or one wireless Ufeline benefits from multiple providers. Note that not all inon-transferable benefits and you may not transfer your bene	Iment or being barred from the nurposes of the Lifeline program . A household may not receive number, but you cannot hav Lifeline services are currently fit to any other person, including	e program. n, as any ind multiple Li e the disco marketed g another e	Lifeline benefits are limitividual or group of individual or group of individual or group of individual or group out on both and you conder the name Lifeline ligible low-income consultation	ted to a single duals who live ay apply your annot receive e. Lifeline is a mer. Violation	other than Compar i Company. If your lowing only 911 call (as described above)	d by completing an outbound call, purchasing y, or by responding to a direct contact from service goes unused for 60 days, you will no s and calls to the Company's customer care or contact the Company to confirm that you activation and usage requirements.	
of the one-per-household limitation constitutes a violation enrollment from the program, and potentially prosecution by  By checking this box, I hereby certify that to the best of my knowledge, my househousehouse.	the United States Government.	od the dis	closures listed above	100000000000000000000000000000000000000	ds required for the	this form and to confirm my eligibility for administration of the Lifeline program ive Company, to be used in a Lifeline	
Customer Application Information:					Date:		
First Name Middle Initial	Last Name		Date of Birth (MM/DD/	ΥΥ)	Date.		
Residential Address w/ street name & Apt Number (PO Box	cannot be accepted) City	/ State	/ Zip Code		nts Acceptable Proof	oy or retain documentation): for Program-Eligibility:	
Billing Address (if different from Residential Address) (P.O. Bo	x IS sufficient) City	/ State	/ Zip Code		gram;	ement of benefits from a qualifying state, federal or	
Residential Address is Permanent   (Must Choose One)   Service Is New (Choose One)   Service Is Sconversion   Service Is Conversion   Service Is Con				e One)	:a letter of participation in a qualifying state, federal or Tribal program; in participation documents (e.g., the consumer's Supplemental Nutrition > Program (SNAP) electronic benefit transfer card or Medicaid participation opy thereof); or		
Would you like to receive texts or emails from our co	) -				er official document evid eral or Tribal program	encing the consumer's participation in a qualifying	
Yes No This information will be for company use only, & will not be shared with a third party company or organization.  ELIGIBILITY REQUIREMENTS:  Number of persons in Household					cant Account Number	Rep/Agent Signature	
Do you or any member of your household currently in I hereby certify that I currently participate in at				□NO One):	Number		
Supplemental Nutrition Assistance Program (SNA)  Federal Public Housing Assistance Section 8 (FF  Medicaid (not Medicare)  Supplemental Security Income (SSI)	P) Temporary Assist	ance for I Energy As inch Progr	Needy Families (TANF) ssistance Program (LIHE) am's free lunch program Federal Poverty Guidel	AP)			
ADDITIONAL CERTIFICATIONS: I hereby certify, under penalty of perjury, that:					is FedLink Wirel rvice: 1-888-943-	ess, LLC. 3354 * www.fedlinkwireless.com	
☐ I meet the income-based or program-based eligibility	criteria for receiving Lifeline se	rvice and h	nave provided document	ation of			

□ 1 will notify the Company within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I

The Eligible Telecommunications Carrier is **FedLink Wireless, LLC.**5340 Perimeter Parkway CT. Montgomery, Al. 36116 \* Customer Service: 1-888-943-3354 \* www.fedlinkwireless.com



### Recertifying Lifeline Customers

#### Annual Recertification Compliance:

- FedLink commits to re-certify the eligibility of all Lifeline customers and report the results to USAC. Because it has not launched, FedLink has no customers as of June 1, 2012.
- After 2012, FedLink will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
- All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
- In addition, FedLink will continue to follow any state-specific requirements.



# Preventing Waste, Fraud & Abuse

- FedLink utilizes a diligent Enrollment Process
- FedLink's business model primarily employs direct, in-store or over the phone/internet, high quality contact and customer service
- FedLink will not seek reimbursement until a customer has personally activated service (by initiation and/or usage)
- FedLink has a 6o-day non-usage policy
- FedLink emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, representative training, process documentation, non-usage/de-enrollment procedures



# Preventing Waste, Fraud & Abuse

Additional Measures to prevent waste, fraud & abuse:

- Duplicates Database
  - Pooled External Database (CGM, LLC)
  - National Database, when in place
- Provide customer data to PUCs, FCC, and USAC
- Independent Biennial Audits\*
  - \*if FedLink draws \$5 million+ on an annual basis



# QUESTIONS?

